

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DANIEL ALHOLM, individually and on	)	
behalf of those similarly situated,	)	
	)	
<i>Plaintiff,</i>	)	Case No. 1:22-cv-01820
	)	
	)	Hon. Mary M. Rowland
v.	)	
	)	
THE VRDOLYAK LAW GROUP, LLC,	)	
	)	
<i>Defendant.</i>	)	

**MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Rule 26.2, Defendant Vrdolyak Law Group, LLC (“VLG”) respectfully requests that this Court grant it leave to file under seal its Motion to Sanction Plaintiff and Plaintiff’s Counsel for Filing and Vexatiously Pursuing False Claims. In support of this Motion, VLG states as follows:

1. VLG’s Motion contains highly sensitive, confidential information, and attaches confidential documents as exhibits. If publicly filed, this information has the potential to harm and severely prejudice VLG.

2. Pursuant to Local Rule 26.2(c), “[a]ny party wishing to file a document or portion of a document electronically under seal in connection with a motion, brief or other submission must . . . move the court for leave to file the document under seal.” L.R. 26.2(c). VLG therefore seeks the Court’s permission to file its Motion to Sanction Plaintiff and Plaintiff’s Counsel for Filing and Vexatiously Pursuing False Claims under seal.

3. Upon filing its sealed Motion, VLG will immediately transmit a full copy of its brief to Defendants.

WHEREFORE, for the foregoing reasons, Defendant Vrdolyak Law Group respectfully requests that this Court enter an Order granting it leave to file its Motion to Sanction Plaintiff and Plaintiff's Counsel for Filing and Vexatiously Pursuing False Claims under seal.

Dated: October 13, 2022

**VRDOLYAK LAW GROUP, LLC**

Respectfully submitted,

/s/ Robert D. Sweeney

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*Counsel for Defendant Vrdolyak Law Group, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2022, I electronically filed the foregoing with the Clerk of Court for the United States District Court for the Northern District of Illinois by using the CM/ECF system which will automatically send all necessary notifications of this filing to all counsel of record.

\_\_\_\_\_/s/ Robert D. Sweeney

Dated: October 13, 2022